

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

Christopher Bush and David	)	3:10-mc-00008
Bush,	)	(The Honorable James R. Spencer)
Plaintiffs,	)	Civil Action No. 2:07-cv-4936
v		)
Kenneth Hill,	)	(Pending in the
Steven J. Ignatz,,	)	United States District Court for the
Sergeant Tripp,	)	Eastern District of Pennsylvania before
Defendants	)	the
	)	Honorable Mary A. McLaughlin

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**MOTION & MEMORANDUM TO STAY THE DEPOSITION OF  
ISARA ISABELLA SERENE**

**AND NOW COMES** Isara Isabella Serene, Pursuant to Federal Rule of Civil Procedure 45(c)(3), Isara Isabella Serene (“Serene”), through her undersigned attorneys, respectfully moves this Court to Stay the Deposition and Subpoena Duces Tecum issued to Isara Isabella Serene pending the outcome of the Motion to Quash filed with this Court and in support thereof states the following:

1. Plaintiffs filed the above-captioned case in the Eastern District of Pennsylvania on November 26, 2007, now docketed as 07-cv-4936 and set before the Honorable Mary A. McLaughlin.
2. Plaintiffs’ issued a subpoena *duces tecum* for Serene to testify and bring certain private and confidential documents with her for inspection to a deposition scheduled for May 21, 2010.
3. Serene objected subpoena *duces tecum* because it is intrusive and unduly burdensome on Serene.
4. Serene conferred with Plaintiffs’ Counsel to resolve objection but was unable to reach an agreement.
5. Serene filed a Motion to Quash the Subpoena *duces tecum* on May 18, 2010, with the issuing court, the United States District Court for the Eastern District of Virginia.

6. Serene, by and through her counsel, contacted Plaintiffs' counsel requesting that Plaintiffs concur on a stay of the deposition pending the disposition of the Motion to Quash.
7. Plaintiffs' Counsel refused to stay the deposition and threatened sanctions.

**WHEREFORE**, Serene respectfully requests that the Court issue an Order Staying Serene's Deposition pending the outcome of the Motion to Quash Plaintiffs' subpoena *duces tecum*.

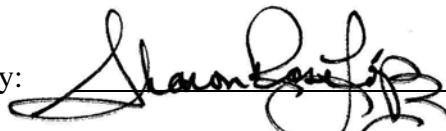
Respectfully Submitted,

Isara Isabella Serene  
By Counsel

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Application Pro Hac Vice Pending

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19<sup>th</sup> day of May, 2010, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) and by regular first class mail to the following:

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Counsel for Deponent  
Isabella Isara Serene

s/ Steven D. Rosenfield

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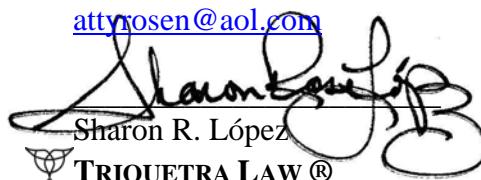
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